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COPY

**By Electronic Mail and U.S. Mail**

Joseph Green, Esquire  
138 West Gay Street  
West Chester, PA 19380

Re: *United States v. Kenneth Schneider,*  
*Criminal No. 10-29*

Dear Mr. Green:

In conjunction with our prior notice of expert testimony, I write to provide you with a written summary of the anticipated testimony pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G). The expert, Dr. Sherri Edelman, has neither examined the victim nor prepared a report. Rather, she will testify generally regarding the psychological and emotional nature of relationships between sexual abusers of children and their victims. This evidence will assist the trier of fact in understanding the behavior of the victim in this case.

Dr. Edelman is expected to testify that the vast majority of victims of child sexual abuse do not disclose the abuse to anyone, disclose on a delayed basis, (including years later), or attempt to disclose but are not believed, making them reluctant to disclose further. Lack of disclosure or delayed disclosure occur for a variety of reasons. These include, but are not limited to: shame; fear of retribution or rejection by the abuser or third parties (such as parents, siblings, or friends); concern about burdening parents and others; attachment to the abuser; and an inability to recognize that what is happening is objectively wrong.

Dr. Edelman will testify that it is well-known in the field of child sexual abuse psychology that in these relationships, the abusers engage in "grooming" activities, which is a type of gradual seduction that evolves from an emotional to a physical, and eventually a sexual relationship. Grooming includes, but is not limited to, the offender complimenting the victim extensively, providing psychological validation of the victim's thoughts, feelings, and behavior, buying gifts, spending time with the child, and providing emotional support and reassurance, all of which have the effect of engendering attachment, validation, dependency, and trust on the part of the victim. Through grooming conduct that is repetitive and consistent, the offender creates emotional dependence on the part of the child. Once an emotional reliance is created, the offender transitions to touching the child in a non-sexual way, and eventually, introduces sexual contact. Throughout this process, the child is repeatedly reassured and told to keep the sexual

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contact secret.

Child victims have a very nubile sense of self-esteem and identity, and sexual abusers exploit this through seduction and manipulation. In addition, at the age of puberty, children have heightened sexual feelings due to natural hormonal changes, causing some offenders to specifically target children in this age group in order to take advantage of this "opportunity."

Dr. Edelman will testify that victims often have positive physical feelings toward their abusers. This is due in part to the fact that the sexual abuse often physically feels good since the human body is anatomically designed to respond positively to sexual stimulation. Thus, it is not unusual for children to become sexually aroused during sexual abuse. This, however, is very confusing to the child victim. The victim may sense that the contact is wrong, yet feel physical enjoyment. This often results in the child blaming himself and experiencing extreme shame.

Dr. Edelman is expected to testify that victims also often have positive emotional feelings toward their abusers, which they are conditioned to experience through the grooming process. Thus, victims associate their abusers with positive attention, validation, and gifts. Victims often feel what they describe as "love" toward their abusers and have strong attachments to them. Abusers often fulfill a surrogate parenting role toward their victims, particularly where victims feel abandoned by their parents, and victims often seek to "earn" love in the relationship by participating in sexual activity.

The extent of psychological damage that a child may experience in a sexually abusive relationship varies depending on the severity and longevity of the abuse, the relationship of the perpetrator, and the extent to which the perpetrator uses fear as a mechanism of control.

Dr. Edelman is expected to describe the mental control that a sexual abuser exercises over his minor victim. She will explain how children tend to view all adults as powerful, which makes them vulnerable targets for being controlled sexual abusers. She will also describe that children often feel that they caused the abuse or that they are at fault.

Dr. Edelman also will describe compensatory strategies that victims use to cope with child sexual abuse. These include denial, rationalization, minimization, and justification. She will explain that children frequently engage in denial regarding situations that they cannot cognitively process, such as sexual abuse, and hide away feelings of fear, confusion, hopelessness, and powerlessness. Children, unlike adults, are more mindful and present than adults, and their brains are not yet formatted to think in the abstract and to process and ruminate over difficult experiences in the same way as adults.


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Dr. Edelman's CV is attached. Dr. Edelman has not testified in the past. Please also note that Dr. Edelman is herself a survivor of child sexual abuse.

Please contact me at the number above with any questions.

Sincerely yours,

ZANE DAVID MEMEGER  
United States Attorney

  
MICHELLE MORGAN-KELLY  
Assistant United States Attorney

Encl.